

# Greenberg Traurig

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FILED/ACCEPTED  
MAR - 3 2009  
Federal Communications Commission  
Office of the Secretary

March 3, 2009

## VIA HAND DELIVERY

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Suite TW-A325  
Washington, DC 20554

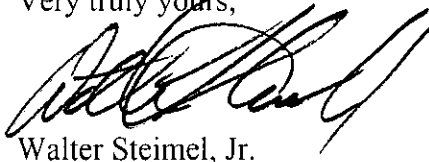
Re: Millennium Telecom LLC  
EB Docket No. 06-36

Dear Ms. Dortch:

Attached please find courtesy copies of the compliance letters mailed by Millennium Telecom LLC. The original compliance letter was mailed by the client to your office.

Please contact us with any comments or questions that you may have.

Very truly yours,



Walter Steimel, Jr.

WES:mhc

Enclosures

No. of Copies rec'd 044  
List ABCDE

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AMSTERDAM  
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WASHINGTON, D.C.  
WEST PALM BEACH  
ZURICH

\*Strategic Alliance



# MILLENNIUM

## TELECOM

LONG DISTANCE FOR BUSINESS

From:  
Millennium Telecom LLC  
7904 River Fork Drive  
Nashville, TN 37221

Attn:  
Marlene H. Dortch,  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554  
( Reference EB Docket No. 06-36 )

Telecommunications Consumer Division  
Accompanying Statement to Annual Certification of CPNI

February 26, 2009

Millennium Telecom LLC has not used CPNI as included in 47 U.S.C. 222(d) exceptions.

- a) Millennium Telecom LLC has not sought customer approval of the use of CPNI since CPNI is not used.
- b) The Company has trained all personnel with access to CPNI as to the identification of CPNI and when CPNI may be used and has an express disciplinary process in place for any improper use of CPNI.
- c) The Company has not used CPNI in any sales or marketing campaign.
- d) No outbound sales and marketing campaign can be conducted without management approval and any such campaign would require supervisory review to assure compliance with the CPNI rules.

As Millennium Telecom only provides services under private individual contract to business customers and not to the public at large, it does not believe that it is subject to the Commission's reporting rule. Millennium Telecom provides this certification as a courtesy, however, and out an abundance of caution in the event the rules are deemed to apply.

Signed:

Daniel M. Mack

Printed:

DANIEL M. MACK

Title:

President - Millennium Telecom LLC

Date:

February 26, 2009

Millennium Telecom LLC 499 Filer ID : 823196



# MILLENNIUM

## TELECOM

LONG DISTANCE FOR BUSINESS

Millennium Telecom LLC  
7904 River Fork Drive  
or - Box 210978  
Nashville, TN 37221  
499 Filer ID: 823196-2008

February 26, 2009

Attn:  
Marlene H. Dortch,  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554  
( Reference EB Docket No. 06-36 )

I, Daniel M. Mack, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

This letter is intended to explain company's procedures that are in place to ensure that the Millennium Telecom is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Millennium Telecom is a small Non-Facility Based Reseller of the following services sold only to selected non-residential business pursuant to individual contract and is not offered to the public at large.

- Interstate, Intrastate, International and Toll Free Long Distance
- Private Line Point to Point Circuits
- Dedicated Interstate Access
- Conference Calling Services

Since before we began providing services our entire company staff has consisted of only two individuals. We together have reviewed the requirements of 47 C.F.R. § 64.2001 and have verbally communicated our policy of not using and not sharing any records of any kind that pertains to any type of service that we provide to our customers. This has in fact been our practice since our inception in 1999. Millennium Telecom achieved revenues resulting in a de minimus status until our first 499A filing in April 2007

Millennium does not directly provide any local dial tone or local voice services to our customers. We do act as agents for several Carriers and / or Local Exchange Carriers when business prospects require voice services we cannot provide directly through Millennium Telecom LLC. As agents for these commission sales we receive only commission income and do not keep or have access to any customer records in regard to these services.



# MILLENNIUM

## TELECOM

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If any additional employees, or any individuals contracting with Millennium, may have access to customer information of any kind, they will be required to sign a confidentiality agreement specifically stating the extreme privacy of this information. Our internal documentation will clearly state our company policy not to use this information internally for marketing purposes as well as our policy not to share this information with anyone or any entity.

This policy statement will be endorsed by all present and future Millennium employees or contracted associates who may have access to customer information of any kind, and all will be required to sign a confidentiality agreement specifically stating our company policy. Millennium Telecom will adhere to a policy that any employee or contractor for Millennium Telecom LLC will have their employment terminated as a result of non-compliance of this company policy.

To date Millennium Telecom has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Millennium Telecom LLC has not used CPNI nor have we sought customer approval of the use of CPNI since CPNI. Millennium Telecom LLC also has not used CPNI in any internal sales or marketing campaign.

As Millennium Telecom only provides services under private individual contract to business customers and not to the public at large, it does not believe that it is subject to the Commission's reporting rule. Millennium Telecom provides this certification as a courtesy, however, and out an abundance of caution in the event the rules are deemed to apply.

Please call anytime it is necessary @ 877-797-5562

Sincerely,

*Daniel M. Mack*

Daniel M. Mack  
President  
Millennium Telecom LLC  
877-797-5562



# MILLENNIUM

## TELECOM

LONG DISTANCE FOR BUSINESS

### Annual 64.2009(e) CPNI Certification

Date Filed: February 26, 2009  
Company Name: Millennium Telecom LLC  
Form 499 Filer ID: 823196-2008  
Name of signatory: Daniel M. Mack  
Title of signatory: President

Marlene H. Dortch,  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554  
( Reference EB Docket No. 06-36 )

I, Daniel M. Mack, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules .

Millennium Telecom LLC has not in the past and does not plan to use any CPNI information for marketing purposes in the future.

Millennium Telecom LLC has not taken any actions, including but not limited to proceedings instituted or petitions filed by at either state commissions, the court system, or at the Commission, against data brokers) against data brokers in the past year. We have no information with respect to the processes pretexters are using to attempt to access CPNI , and the steps we have take to protect CPNI are detailed in the attached Company Statement.

Millennium Telecom LLC has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

As Millennium Telecom only provides services under private individual contract to business customers and not to the public at large, it does not believe that it is subject to the Commission's reporting rule. Millennium Telecom provides this certification as a courtesy, however, and out an abundance of caution in the event the rules are deemed to apply.

Signed

Daniel M. Mack

Printed Name: Daniel M. Mack  
President – Millennium Telecom